

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

The Persons of Curtis Snipes and Terry Ezell

Case No. MJ21-195

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The persons of Curtis Snipes and Terry Ezell, as further described in Attachments A1 and A2, attached hereto and incorporated herein by reference.
located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, List of Items to be Seized, attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

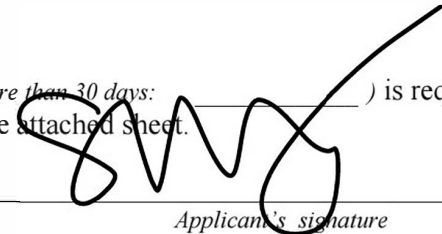
18 U.S.C. § 922(g)

Felon in Possession of a Firearm

The application is based on these facts:

See Affidavit of Shawna McCann, attached hereto and incorporated herein by reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

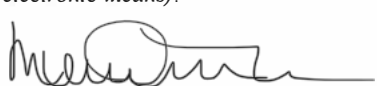
FBI Special Agent Shawna McCann

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means).

Date: 04/06/2021


Judge's signature

City and state: Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge

Printed name and title

AFFIDAVIT OF SHAWNA MCCANN

COUNTY OF KING)
)
STATE OF WASHINGTON)

I, Shawna McCann, a Special Agent with the Federal Bureau of Investigation (FBI), having been duly sworn, state as follows:

INTRODUCTION

1. This Affidavit is submitted for the limited purpose of establishing probable cause to search the following:

a. The person of CURTIS G. SNIPES, who is more particularly described in Attachment A1 (attached hereto and incorporated herein). The purpose of the search is to obtain buccal swabs (swabs of the inside of his cheek or gums), which will be used to develop his DNA profile, as more particularly described in Attachment B (attached hereto and incorporated herein).

b. The person of TERRY L. EZELL, who is more particularly described in Attachment A2 (attached hereto and incorporated herein). The purpose of the search is to obtain buccal swabs (swabs of the inside of his cheek or gums), which will be used to develop his DNA profile, as more particularly described in Attachment B (attached hereto and incorporated herein).

2. While executing search warrants, agents recovered a pistol in the bedside table of a bedroom associated with CURTIS SNIPES; a revolver in the bedside table of another bedroom at a different residence associated with CURTIS SNIPES; and a pistol in the glove box of a vehicle driven by TERRY EZELL. These firearms were, or will be, swabbed for future DNA analysis and a comparison to the DNA of CURTIS SNIPES and TERRY EZELL, respectively. The FBI DNA Laboratory will use CURTIS SNIPES's and TERRY EZELL's DNA reference samples obtained pursuant to these requested search warrants to generate a DNA profile, which will then be compared to any DNA profile generated from the DNA swabs taken from the firearms.

AFFIANT BACKGROUND AND QUALIFICATIONS

3. I am employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been employed with the FBI since September 2017. I am currently assigned to the Seattle Field Division where I am a member of the violent crime, gang, and Transnational Organized Crime – Western Hemisphere squad. In this capacity, I investigate, *inter alia*, violations of the Controlled Substance Act, Title 21, United States Code, Section 801 *et seq.*, and related offenses. I have received specialized training in the enforcement and investigation of the Controlled Substance Act. I have received over 400 hours of classroom training including, but not limited to, drug identification, drug interdiction, money laundering techniques and schemes, smuggling, and the investigation of individuals and/or organizations involved in the illegal possession, possession for sale, sales, importation, smuggling, manufacturing, and trafficking of controlled substances.

4. In my role as a Special Agent for the FBI, I have participated in narcotics investigations (e.g., heroin, cocaine, marijuana, and methamphetamine) that have resulted in the arrest of individuals and the seizure of illicit narcotics and/or narcotics-related evidence and the forfeiture of narcotics-related assets. I have been involved in the service of federal and state search warrants as part of these investigations. I have encountered and have become familiar with various tools, methods, trends, paraphernalia, and related articles utilized by various traffickers in their efforts to import, export, conceal, and distribute controlled substances. I am also familiar with the manner in which drug traffickers use telephones, often cellular telephones, to conduct their unlawful operations, and how they code their conversations to disguise their unlawful activities. I am also familiar with the various methods of packaging, delivering, transferring, and laundering drug proceeds. Additionally, through my training and experience, I can identify illegal drugs by sight, odor, and texture.

5. I have also worked on drug investigations involving the use of court-authorized wiretaps under Title III. In that capacity, I have had the opportunity to

1 monitor, listen to, and review transcripts and line sheets (prepared by linguists)
2 documenting the content of hundreds of intercepted conversations involving the
3 trafficking of cocaine, methamphetamine, heroin, and other narcotics, by persons who
4 used some form of code to attempt to thwart law enforcement detection. I have also
5 interviewed defendants at the time of their arrest and have debriefed, spoken with, and/or
6 interviewed numerous drug dealers or confidential sources (informants) at proffer and
7 field interviews who were experienced in speaking in coded conversation over the
8 telephone. From these interviews, and also from discussions with other experienced
9 agents, I have gained knowledge regarding the various methods, techniques, codes,
10 and/or jargon used by drug traffickers in the course of their criminal activities, including
11 their use of firearms to protect their narcotics-related activities and of cellular telephones
12 and other electronic means to facilitate communications while avoiding law enforcement
13 scrutiny.

14 6. I have written affidavits in support of court-authorized federal warrants and
15 orders in the Western District of Washington for GPS tracking of telephones, Pen
16 Register/Trap and Trace, and search warrants. Additionally, I have testified in grand jury
17 proceedings, written investigative reports, and conducted and participated in numerous
18 interviews of drug traffickers of various roles within drug organizations, which has
19 provided me with a greater understanding of the methods by which drug trafficking
20 organizations operate.

21 7. I am an investigative law enforcement officer of the United States within
22 the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations
23 of, and to make arrests for, violations of the Controlled Substance Act, Title 21, United
24 States Code, Section 801 *et seq.*, and related offenses.

25 8. The facts set forth in this Affidavit are based on my own personal
26 knowledge; knowledge obtained from other individuals during my participation in this
27 investigation, including other law enforcement personnel; review of documents and
28 records related to this investigation; communications with others who have personal

1 knowledge of the events and circumstances described herein; and information gained
2 through my training and experience. Because this Affidavit is submitted for the limited
3 purpose of establishing probable cause in support of the Application for a search warrant,
4 it does not set forth each and every fact that I or others have learned during the course of
5 this investigation.

6 **Background Regarding the Michael Walker DTO**

7 9. The United States, including the FBI, is conducting a criminal investigation
8 of Michael Walker and the Michael Walker DTO regarding possible violations of
9 Title 21, United States Code, Sections 841, 846, 843(b), and related crimes.

10 10. Investigators believe Michael Walker to be a trafficker of narcotics in this
11 District. To summarize, according to historical reports, Michael Walker has been a
12 subject or person of interest in drug investigations at least as far back as 2016, including
13 reports of Michael Walker making trips to and from Los Angeles to pick up narcotics and
14 supplying cocaine to numerous individuals. In 2019, two separate individuals stated they
15 had purchased cocaine from Michael Walker and/or Michael Walker's associates,
16 Maghan Stenson, Stevie Allen, and Jamaal Davis, on several occasions in the past.

17 11. Beginning in 2019, the FBI and Seattle Police Department (SPD) began
18 investigating Michael Walker and the drug trafficking organization (DTO) Michael
19 Walker is affiliated with within the Western District of Washington. Through the use of
20 confidential source information and traditional investigative techniques, agents¹
21 identified several individuals, including Michael Walker, Maghan Stenson, Jamaal Davis,
22 James Lowe, Kevin Gipson, and Stevie Allen who are involved in the trafficking and
23 distribution of drugs in this District.

24
25
26
27 ¹ When I use the term "agents" throughout this Affidavit, I am referring to law enforcement personnel, including but
28 not limited to FBI agents and intel personnel, DEA agents, IRS agents, task force officers, and Seattle Police
Department sergeants, detectives, and officers.

12. On July 9, 2020, the Honorable Ricardo S. Martinez, Chief United States District Judge for the Western District of Washington, signed an order authorizing the interception of wire and electronic communications of Michael Walker (TT8), Kevin Gipson (TT6), and Stevie Allen (TT7), and others yet unknown, to and from TT8, TT6, and TT7. As set forth in the court-authorized wiretap Application and Affidavit, there is probable cause to believe that TT8, TT6, and TT7 are being used in furtherance of a drug trafficking conspiracy, as well as a conspiracy to commit the offense of money laundering. Interception of TT8 and TT6 commenced on July 9, 2020, and terminated on August 7, 2020. Interception of TT7 commenced on July 10, 2020, and terminated on August 7, 2020. During the period of interception, agents identified Jerrell Ingram (TT12), Jimmy Carter (TT13 and TT20), Jamar Howard (TT14), Larry Collins (TT16), Herbert Scott (TT17), and David Kelley (TT19) as sources of supply of narcotics to other associates of the Michael Walker DTO including Kevin Gipson (TT6) and Michael Walker (TT8).

13. On September 3, 2020, the Honorable Ricardo S. Martinez, Chief United States District Judge for the Western District of Washington, signed an order authorizing the interception of wire and electronic communications of Jerrell Ingram (TT12), Jimmy Carter (TT13 and TT20), Jamar Howard (TT14), Larry Collins (TT16), Herbert Scott (TT17), and David Kelley (TT19), and others yet unknown, to and from TT12, TT13, TT14, TT16, TT17, TT19, and TT20. As set forth in the court-authorized wiretap Application and Affidavit, there is probable cause to believe that TT12, TT13, TT14, TT16, TT17, TT19, and TT20 are being used in furtherance of a drug trafficking conspiracy, as well as a conspiracy to commit the offense of money laundering. Interception of these Target Telephones commenced on September 3, 2020, and terminated on October 2, 2020. During the period of interception, agents identified Sergio Reyes-Pina (TT18 and TT38), Raul Barreto Bejines (TT34), Kefentse Olabisi (TT30), Yusef Parrish (TT43), Curtis Snipes (TT39), and David Kelley (TT19) as sources of supply of narcotics to other associates of the Michael Walker DTO including Jimmy

1 Carter (TT13 and TT20), Jamar Howard (TT14), Herbert Scott (TT17), and Larry Collins
2 (TT16).

3 14. On October 23, 2020, the Honorable Ricardo S. Martinez, Chief United
4 States District Judge for the Western District of Washington, signed an order authorizing
5 the interception of wire and electronic communications of Sergio Reyes-Pina (TT18 and
6 TT38), Raul Barreto Bejines (TT34), Kefentse Olabisi (TT30), Yusef Parrish (TT43),
7 Curtis Snipes (TT39), and David Kelley (TT19), and others yet unknown, to and from
8 TT18, TT38, TT34, TT30, TT43, TT39, and TT19. As set forth in the court-authorized
9 wiretap Application and Affidavit, there is probable cause to believe that TT18, TT38,
10 TT34, TT30, TT43, TT39, and TT19 are being used in furtherance of a drug trafficking
11 conspiracy, as well as a conspiracy to commit the offense of money laundering.
12 Interception of these Target Telephones commenced on October 23, 2020, and terminated
13 on November 21, 2020.² During the period of interception, agents identified Samuel
14 Duarte Avila (TT45 and TT62), Cesar Arambula (TT59), and EUGENE MCGEE (TT23)
15 as sources of supply of narcotics to other associates of the Michael Walker DTO,
16 including Larry Collins, Randolph Brown, Sergio Reyes-Pina, David Armer, and Elyas
17 Kerow.

18 15. On February 8, 2021, the Honorable Ricardo S. Martinez, Chief United
19 States District Judge for the Western District of Washington, signed an order authorizing
20 the interceptions of wire and electronic communications of Samuel Duarte Avila (TT45
21 and TT62), Eugene McGee (TT23), and Larry Collins (TT16), and wire communications
22 of Cesar Arambula (TT59), and others yet unknown to and from these phones. As set
23 forth in the court-authorized wiretap Application and Affidavit, there is probable cause to
24 believe that TT45, TT62, TT59, TT23, and TT16 are being used in furtherance of a drug
25

26 ² On October 28, 2020, and October 30, 2020, investigators executed search warrants on three homes, three vehicles,
27 and one person, all connected to Curtis Snipes. At the conclusion of the execution of these search warrants,
28 collectively seven guns, six phones, more than \$92,000, and approximately one quarter kilogram of cocaine was
seized. One of the phones seized was TT39, used by Curtis Snipes. Because that phone came into police custody,
interception was intentionally discontinued on November 2, 2020.

1 trafficking conspiracy, as well as a conspiracy to commit the offense of money
 2 laundering. Interception of these Target Telephones commenced on February 8, 2021,
 3 and terminated on March 9, 2021.³

4 **SUMMARY OF PROBABLE CAUSE**

5 **Firearms Seized from Curtis Snipes's Residence and Terry Ezell's Vehicle.**

6 16. On October 28, 2020, at approximately 11:30 a.m., CURTIS SNIPES
 7 (identification discussed below) on TT39 received a text message from phone number
 8 (206) 920-8517, later identified as Michael Hopkins as discussed below, reading, "Should
 9 let me baby sit." (Session 161.) CURTIS SNIPES responded, "Whatever." (Session 165.)
 10 Based on my training and experience, the training and experience of other agents I am
 11 working with, and a prior investigation into this same gang set, I know that the term
 12 "baby" is commonly used by this gang set and drug traffickers to refer to 4.5 ounces of
 13 narcotics (about one-eighth of a kilogram), specifically in this context cocaine. I believe
 14 that Michael Hopkins was asking CURTIS SNIPES to front him 4.5 ounces of cocaine
 15 for Michael Hopkins to sell and then repay CURTIS SNIPES.⁴

16 17. On October 28, 2020, at approximately 3:56 p.m., CURTIS SNIPES using
 17 TT39 called Michael Hopkins at phone number (206) 920-8517. (Session 196.) During
 18 this call the following discussion took place:

19 Hopkins: You need to let me baby sit [front him 4.5 ounces of cocaine to sell].

20 TT39: Oh yeah. I ain't got a problem with it. You know...

21 Hopkins: Yeah. Uh, shit where you at, the city or...?

22 TT39: Uh, yeah, I'm in the city right now.
 23

24
 25 ³ Agents, on their own initiative and after reviewing the intercepted communications on TT16 during this period,
 26 made the decision to terminate wire and electronic interceptions on TT16 on March 2, 2021, prior to the full thirty-
 27 day period authorized.

28 ⁴ Based on prior conversations that investigators intercepted between CURTIS SNIPES and his
 customers/redistributors, it appears that CURTIS SNIPES regularly fronts cocaine to his customers/redistributors.
 For instance, he has discussed going to meet with them in order to collect money from them for narcotics that he had
 previously provided them. Michael Hopkins's terminology of "babysitting" also indicates to investigators that he
 expected to receive the cocaine to sell and then pay CURTIS SNIPES for it at a later time.

1 Hopkins: Ok, well shit. I'm in Texas. I gotta go to Mexico [further south], and
2 then shit, I'll be in the city later on, so.⁵

3 TT39: Oh no, I'm coming right back out that way, so I'll call you when I'm on my
4 way back out that way.

5 Hopkins: Ok.

6 18. Based on my training and experience, I believe that this is a continuation of
7 the conversation between CURTIS SNIPES and Michael Hopkins, in which Hopkins is
8 asking to get fronted 4.5 ounces of cocaine by CURTIS SNIPES and that the parties
9 agreed to talk later to arrange a meeting to conduct the narcotics transaction.

10 19. On October 28, 2020, at approximately 9:21 p.m., CURTIS SNIPES using
11 TT39 called Michael Hopkins at phone number (206) 920-8517. (Session 223.) During
12 this call the following discussion took place:

13 Hopkins: Hello.

14 TT39: Where you at?

15 Hopkins: Uh, shit. On my way. Just leaving the city.

16 TT39: Huh?

17 Hopkins: I'm just leaving the city.

18 TT39: Alright, I'm waiting on you.

19 Hopkins: Ok.

20 TT39: Alright.

21 20. On October 28, 2020, at approximately 10:07 p.m., Michael Hopkins using
22 phone number (206) 920-8517 called CURTIS SNIPES at TT39. (Session 224.) During
23 this call CURTIS SNIPES told Michael Hopkins to "come on" and that he was "about to
24 go to bed." Michael Hopkins told CURTIS SNIPES to give him "three to five minutes."
25

26
27 ⁵ Investigators are unfamiliar with this particular slang but presume that it references Michael Hopkins being south
28 of CURTIS SNIPES's location, and needing to go further south before he could meet up with CURTIS SNIPES.
Michael Hopkins was plainly not in Texas or Mexico, as he met with CURTIS SNIPES at CURTIS SNIPES's
residence in Tacoma later that day.

Based on my training and experience, I believe CURTIS SNIPES told Michael Hopkins that he was at his house about to go to bed and to come to the house to conduct the narcotics transaction for the “baby,” referencing the 4.5 ounces of cocaine, and that Michael Hopkins said he would be at CURTIS SNIPES’s house in about three to five minutes. Based on prior physical surveillance, GPS location data for TT39, and a pole camera installed in the vicinity of 3651 South Tyler Street, Tacoma, Washington, agents know that CURTIS SNIPES resides at 3651 South Tyler Street, Tacoma, Washington (Subject Premises 2). Around the time of the above-referenced phone calls, GPS location data for TT39 indicated that the phone device was at Subject Premises 2. On the evening of October 28, 2020, via remote pole camera surveillance, agents observed that a 2004 silver BMW 530 sedan bearing Washington license plate 887ZOM, registered to Fay Alecander aka Fay Alexander and Diamond Alexander at 6603 4th Street E, Tacoma, Washington (Subject Vehicle 1) and a 2016 silver Mercedes C sedan bearing Washington license plate BWE7253, registered to Lacharl Patrice Carter at 3220 81st Place SE, Unit 220, Mercer Island, Washington, were parked in the driveway of Subject Premises 2.

21. On October 28, 2020, at approximately 10:12 p.m., Michael Hopkins using phone number (206) 920-8517 texted CURTIS SNIPES at TT39, reading “Outside.” (Session 225.) Around that same time, via the remote pole camera surveillance, agents observed a truck pull into the driveway of Subject Premises 2 and park behind Subject Vehicles 1 and 2. A male exited the truck and was observed making a phone call on a cell phone. Around that time at approximately 10:13 p.m., CURTIS SNIPES on TT39 received a phone call from Michael Hopkins using phone number (206) 920-8517. (Session 227.) During the call, Michael Hopkins told CURTIS SNIPES that he was outside, and CURTIS SNIPES said “alright.” A few seconds later, Michael Hopkins went inside Subject Premises 2. About seven minutes later, at approximately 10:20 p.m., Michael Hopkins was observed exiting Subject Premises 2, getting into the truck, and driving off. Agents followed Michael Hopkins driving in the truck from Subject Premises 2. Michael Hopkins drove directly to a shopping center about ten minutes away. Before

1 Michael Hopkins made any stops or got out of the vehicle, agents conducted a traffic stop
2 on Michael Hopkins as he was entering the shopping center parking lot. Agents
3 conducted a probable cause search of Michael Hopkins and his truck and located
4 approximately 4.5 ounces of cocaine in the front pouch of Michael Hopkins's hoodie that
5 he was wearing, and a box of ammunition in his truck. He was positively identified as
6 Michael Hopkins from identification on his person, and he was released at the scene.

7 22. On October 28, 2020, at approximately 11:00 p.m., Michael Hopkins using
8 phone number (206) 920-8517 sent a text message to CURTIS SNIPES at TT39, reading
9 "911." (Session 230.) Using the same phone, Michael Hopkins also attempted to call
10 CURTIS SNIPES, who did not answer. (Session 232.) Michael Hopkins had provided the
11 phone number (206) 920-8517 to investigators as his own phone number during the
12 traffic stop. Based on my training and experience, I believe that Michael Hopkins was
13 alerting CURTIS SNIPES to the fact that police had stopped him shortly after leaving
14 CURTIS SNIPES's house, Subject Premises 2, and had found cocaine on him.

15 23. On October 28, 2020, at approximately 11:42 p.m., via remote pole camera
16 surveillance, agents observed a male on a motorbike pull into the driveway of Subject
17 Premises 2 and walk up to the door of CURTIS SNIPES's house; a few seconds later, the
18 male walked inside Subject Premises 2. The male was wearing the same clothing as
19 Michael Hopkins was during the traffic stop. Specifically, Michael Hopkins had been
20 wearing a black baseball hat, blue Seahawks sweatshirt or hoodie, and blue sweatpants
21 during the stop; the person who met with CURTIS SNIPES was as well. Michael
22 Hopkins is about 6'2" and 220 pounds, consistent with the person investigators saw
23 meeting with CURTIS SNIPES. The truck that Michael Hopkins was driving when
24 stopped by investigators was registered to him. A search of Washington State Department
25 of Licensing records shows that a motorbike similar in appearance to the one
26 investigators observed is also registered to Michael Hopkins. At approximately 11:59
27 p.m., the male exited Subject Premises 2 and drove off on the motorbike. Agents believe
28

1 that the male was Michael Hopkins, and that he returned to CURTIS SNIPES's house to
2 tell CURTIS SNIPES about having just been stopped by law enforcement.

3 24. On October 29, 2020, at approximately 12:19 a.m., via remote pole camera
4 surveillance, agents observed CURTIS SNIPES quickly exit Subject Premises 2, as if he
5 were in a hurry, carrying a duffel bag. CURTIS SNIPES placed the duffel bag in Subject
6 Vehicle 1 and drove off. Based on prior intercepted calls on TT39 discussed above,
7 agents believe that CURTIS SNIPES was in possession of up to six kilograms of cocaine
8 that he was trying to sell/re-distribute to his close circle of trusted associates, including
9 Jamar Howard (TT14) and Yusef Parrish (TT43). (Sessions 45, 60, 78, 81, 135, 169, 171,
10 207.) Agents believe that CURTIS SNIPES was relocating his supply of cocaine,
11 concealed in the duffel bag, after learning that agents had just stopped Michael Hopkins
12 almost immediately after Michael Hopkins had left CURTIS SNIPES's house (Subject
13 Premises 2) following their narcotics transaction.

14 25. On October 30, 2020, the Honorable Brian A. Tsuchida, Chief United
15 States Magistrate Judge for the Western District of Washington, signed a search warrant
16 for Subject Premises 2, Subject Vehicle 1, and the person of Curtis G. Snipes. The
17 warrant also authorized agents to search 3220 81st Place SE, Unit 220, Mercer Island,
18 Washington 98040 (Subject Premises 1), another residence where agents knew CURTIS
19 SNIPES spent time, and another vehicle associated with CURTIS SNIPES (Subject
20 Vehicle 2).⁶

21 26. On October 30, 2020, at approximately 12:07 p.m., CURTIS SNIPES using
22 TT39 called TERRY EZELL (identification discussed below) at phone number (206)
23 773-7737. (Session 258.) During this call the following discussion took place:

24 Ezell: When you get off?

25 TT39: Uh, 3:30

26
27
28 ⁶ As referenced above, *see* note 2, agents also obtained and executed a search warrant for a vehicle and residence
associated with CURTIS SNIPES on October 28, 2020. Neither of those locations are at issue in this Application.

1 Ezell: Uh, you gonna, you gonna slide through or...

2 TT39: Yeah. Yep, I hear you. You meet me outside?

3 Ezell: Uh, down by your spot?

4 TT39: Yeah.

5 Ezell: Uh, yep. Wait, wait wait. Let me look... let me look at the time.

6 TT39: Huh?

7 Ezell: Uh, I'm looking at the time.

8 TT39: [unintelligible]

9 Ezell: Yeah imma pull up. I can pull up. What's that 3:30?

10 TT39: Yeah.

11 Ezell: Ok, alright.

12 27. Based on my training and experience, and other intercepted calls of
13 CURTIS SNIPES, I believe that TERRY EZELL and CURTIS SNIPES agreed to meet
14 up to conduct a drug-related transaction. CURTIS SNIPES and his associates, including
15 his narcotics customers/re-distributors whom he supplies, frequently use the term "slide
16 through" as coded language for a drug-related transactions, including CURTIS SNIPES
17 dropping off narcotics, picking up narcotics proceeds, or exchanging narcotics for money.
18 I know that CURTIS SNIPES worked at Darigold in Seattle and got off at work around
19 3:30 p.m. On October 30, 2020, agents had physical surveillance on CURTIS SNIPES
20 and saw him and Subject Vehicle 1 at Darigold. Accordingly, I believe that CURTIS
21 SNIPES arranged to meet with TERRY EZELL outside of Darigold at 3:30 p.m. when
22 CURTIS SNIPES got off of work.

23 28. On October 30, 2020, at approximately 3:30 p.m., agents observed
24 CURTIS SNIPES exit the employee door/gate of Darigold and wave at a male in a 2017
25 Hyundai Elantra sedan bearing Washington license plate BQR7928, registered to Lena
26 Mae Jones at 310 25th Avenue, Seattle, Washington (Subject Vehicle 3). CURTIS
27 SNIPES and the male, later identified as TERRY EZELL, exchanged hand signals,
28 indicating that TERRY EZELL in Subject Vehicle 3 wanted CURTIS SNIPES to follow

1 him. CURTIS SNIPES got into Subject Vehicle 1 and followed TERRY EZELL in
2 Subject Vehicle 3 to a parking lot around the corner from Darigold. In the parking lot,
3 agents observed CURTIS SNIPES exit Subject Vehicle 1 and get into the front passenger
4 seat of Subject Vehicle 3 and meet with TERRY EZELL. About a minute later, agents
5 conducted a vehicle stop on Subject Vehicle 3 and Subject Vehicle 1.

6 29. Agents made contact with CURTIS SNIPES in the front passenger seat of
7 Subject Vehicle 3, identified him as CURTIS SNIPES based on a comparison to his
8 driver's license photograph and from being familiar with him from prior physical
9 surveillance during this investigation, and removed him from that vehicle. Agents
10 conducted a protective sweep/search of CURTIS SNIPES and the areas of Subject
11 Vehicle 3 that were within arm's reach of CURTIS SNIPES, to include the unlocked
12 glove compartment on the front passenger side of Subject Vehicle 3. Agents observed a
13 firearm in the glove compartment of Subject Vehicle 3, which agents left in place in the
14 vehicle and closed the glove compartment. Agents also contacted the driver of Subject
15 Vehicle 3, who was identified as TERRY EZELL based on the identification he
16 presented.

17 30. Agents are aware that both CURTIS SNIPES and TERRY EZELL are
18 felons, including having federal felony convictions, and are prohibited from possession a
19 firearm. Agents impounded Subject Vehicle 3 and obtained a search warrant, which was
20 subsequently executed, and agents recovered from the glove box a Springfield Arms
21 9mm pistol bearing serial number BY298347; it was found loaded with a round
22 chambered.

23 31. A short time later, on October 30, 2020, agents conducted a full search of
24 CURTIS SNIPES's person and Subject Vehicle 1 pursuant to the federal search warrants
25 issued earlier that day. On CURTIS SNIPES's person, agents located four cell phone
26 devices and \$7,746.00 wrapped/rolled in a rubber band. The denominations of bills were
27 consistent with narcotics proceeds; specifically, predominantly smaller bills—\$20s and
28 \$10s—indicative of street level drug transactions/prices. Based on the above referenced

1 call, other intercepted calls where CURTIS SNIPES has discussed “sliding through” to
2 pick up money and/or drop off narcotics with his associates/re-distributors, investigators
3 believe that the money found on CURTIS SNIPES was narcotics proceeds and that
4 CURTIS SNIPES met with TERRY EZELL to receive the narcotics proceeds from
5 TERRY EZELL.

6 32. In the evening of October 30, 2020, agents conducted a search of Subject
7 Premises 1 and Subject Premises 2. In Subject Premises 2 (the location where Michael
8 Hopkins had gone to meet with CURTIS SNIPES before and after he was stopped with
9 about 4.5 ounces of cocaine, or a “baby,” on October 29, 2020), agents located a Smith &
10 Wesson SW9V 9mm pistol bearing serial number PAY3159 in a bedside table, two
11 digital scales, a heat sealer, and heat seal bags. In addition, there was a large ceiling panel
12 with insulation on the bed in the bedroom where the firearm was located, which matched
13 an open ceiling panel leading to the attic, as if someone had retrieved something from
14 that space and not closed it back up. In the pantry of Subject Premises 2, agents located
15 several boxes of ammunition. Finally, agents located a passport in CURTIS SNIPES’s
16 name at Subject Premises 2, as well as mail addressed to CURTIS SNIPES at that
17 address.⁷ Agents did not locate evidence suggesting that additional people resided at
18 Subject Premises 2, beyond CURTIS SNIPES.

19 33. When agents executed the search warrant on Subject Premises 1, they
20 contacted the occupant, Lacharl Carter, who identified herself as CURTIS SNIPES’s
21 girlfriend. Lacharl Carter showed agents the bedroom that she shared with CURTIS
22 SNIPES when he stayed at her residence and identified the side of the bed on which
23 CURTIS SNIPES usually slept. Agents located a loaded revolver model RG23 bearing
24 serial number T474567 in the bedside table drawer on the side of the bedroom where
25 CURTIS SNIPES’s slept and where it also appeared that he kept his clothes, as well as
26 \$10,000 in US currency (also banded with rubber bands) stored next to the firearm.

27
28 ⁷ Agents also located at Subject Premises 2 mail addressed to CURTIS SNIPES at yet another address.

1 During the interview of Lacharl Carter, she stated that she did not know there was a
2 firearm in the apartment and had never seen the firearm before. Lacharl Carter stated that
3 the only other person who had been in the apartment (excluding her minor daughter) was
4 CURTIS SNIPES, who had spent the night prior at the apartment. Lacharl Carter also
5 acknowledged that she was aware that CURTIS SNIPES did keep a firearm at his
6 primary residence in Tacoma, Washington (Subject Premises 2), and provided a
7 description of that firearm that matched the Smith & Wesson pistol that agents had
8 located at Subject Premises 2.

9 34. Each of the items seized (i.e., the firearm from TERRY EZELL's car and
10 the two firearms from two different residences where CURTIS SNIPES stays) were
11 photographed in place and collected as evidence by FBI Seattle. FBI Seattle then sent two
12 of the three firearms to the FBI Lab in Quantico, Virginia for DNA testing and latent
13 print analysis where the firearms were swabbed and the swabs preserved for future DNA
14 analysis and a direct comparison to the DNA from CURTIS SNIPES and TERRY
15 EZELL. Agents will be sending the third firearm to the FBI Lab shortly.

16 35. On March 18, 2021, ATF Special Agent Claudia Grigore, who has received
17 specialized training in the recognition and identification of firearms and ammunition and
18 their place of manufacture, reviewed photographs of the pistol recovered in CURTIS
19 SNIPES's residence (Subject Premises 2). Based on her training and experience, SA
20 Grigore made a preliminary determination that the pistol is a firearm within the meaning
21 of Title 18, United States Code, Section 921(a)(3), and that it was not manufactured in
22 the state of Washington. As a result, the firearm must have traveled in/or affected
23 interstate or foreign commerce in order to be possessed in the state of Washington. The
24 other two firearms have not yet been evaluated with respect to their place of manufacture,
25 although I am aware that Springfield Armory is not based in Washington.

26 36. CURTIS SNIPES has been convicted of the following felony crime
27 punishable by imprisonment for a term exceeding one year: *Distribution of Cocaine*
28 *Base*, on or about November 26, 1996, in the United States District Court for the Western

1 District of Washington, cause number CR96-425. The original sentence imposed was 135
2 months.

3 37. TERRY EZELL has been convicted of the following felony crimes
4 punishable by imprisonment for a term exceeding one year: *Felon in Possession of a*
5 *Firearm and Possession of Cocaine Base with Intent to Distribute*, on or about July 11,
6 2008, in the United States District Court for the Western District of Washington, cause
7 number CR05-273. The original sentence imposed was 262 months. I have spoken with a
8 U.S. probation officer in this District, who has confirmed that TERRY EZELL is
9 currently on supervised release in this District following his release from prison.

10 **INFORMATION ABOUT DNA**

11 38. Based on my training and experience, I know that each human has his or
12 her own Deoxyribose Nucleic Acid (DNA) markers, and that, since the inception of the
13 use of DNA in forensic science, DNA analysis has been widely used for identification.
14 Humans may leave traces of their DNA on objects (such as firearms and ammunition) in
15 various forms, including, but not limited to, semen, sweat, and blood. In addition, based
16 on my training and experience, I know that crime laboratories can identify the source of
17 DNA obtained from a crime scene by the comparison of that DNA profile to the DNA
18 profiles of persons from whom it may have originated.

19 39. Based on my training and experience, I know that DNA is typically
20 collected from a person by rubbing one or more long cotton swabs against the inner
21 cheek. The swabs are then preserved by being placed in a sterile container and sealed. If
22 this search warrant application is approved, I will follow these protocols by swabbing
23 CURTIS SNIPES's and TERRY EZELL's inner cheek/gum area with one or more long
24 cotton swabs, provided to me in sterile form. I will then place the cotton swabs in a sterile
25 container and seal the container. I will then place the sterile container containing the
26 swabs into another container that will be sealed and sent to FBI's DNA laboratory for
27 analysis.

28 ///

ATTACHMENT A1
(Person to be Searched)

CURTIS G. SNIPES, date of birth 06-30-1970.

ATTACHMENT A2
(Person to be Searched)

TERRY L. EZELL, date of birth 08-05-1966.

ATTACHMENT B

(Items to Be Seized)

From the individuals identified in Attachments A1 and A2: Up to six swabs each of their inner cheek/gum areas (i.e., buccal swabs), to be used to develop a DNA profile for comparison purposes.